UCLA Policy 825: Key and Electronic Access Administration and Control – Draft for Public Review

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I. PURPOSE & SCOPE

This Policy maximizes the security of UCLA facilities by providing the administration and control of campus keys, and establishing the framework for moving the campus to electronic building Bruin Card access. Bruin Card is the only electronic building access system authorized on the UCLA campus.

This Policy applies to keys and Bruin Card access used for entrance into any on-campus building and spaces within buildings, including but not limited to offices, laboratories, classrooms, residence halls and meeting spaces.

Exceptions: This Policy does not apply to keys or electronic Bruin Card access to residential apartments, the UCLA Medical Center and other Health System spaces, UC Police Department, the UCLA Faculty Club, ASUCLA facilities, Athletics Facilities, Luskin Conference Center, UCLA Guest House, or leased space.

II. DEFINITIONS

For the purposes of this Policy:

Building Entrance Key Control Coordinator is the individual(s) designated by their Department Head in the official campus Space Inventory database who has the authority to change and/or authorize access to a building that has not yet transitioned to electronic Bruin Card access.

<u>Building Coordinator</u> is the individual(s) appointed by the Department Head to serve as the Facilities Management (FM) principal point of contact for FM issues in a particular building(s). The individual(s) may or may not also be the Building Entrance Key Control Coordinator, and is the individual(s) responsible for coordinating Bruin Card access for building occupants with Bruin Card staff, for buildings that have transitioned to Bruin Card access.

<u>On-Master Spaces</u> are areas/rooms that are readily accessible to FM custodial and maintenance personnel.

<u>Off-Master Spaces</u> are areas/rooms that are accessible only to department personnel and are specifically not accessible to FM personnel. These areas normally contain confidential personnel records, cash money, vivaria, or potentially harmful laboratory chemicals or biological materials (e.g. BSL-3 laboratories).

III. POLICY STATEMENT

Buildings are keyed in accordance with a campus master keying plan. Unauthorized fabrication, duplication, possession, or use of keys to premises owned by the University of California is a crime (California Penal Code, <u>Section 469</u>) and a violation of this Policy.

The FM Hardware Shop fabricates and issues campus keys according to this Policy and <u>UCLA</u> <u>Procedure 825.1</u>: Building Entrance Keying, Electronic Access, and Control. The FM Hardware Shop is responsible for the overall administration of campus keys.

As of the issuance of this Policy, the UCLA campus is transitioning from physical key access to electronic Bruin Card reader access for all campus buildings. The intent is to install each building with a Bruin Card reader on at least two entrances. Once a building has transitioned to Bruin Card access, all "after normal business hours" or "off-hour" building access must be obtained through the use of an electronic Bruin Card reader. In general, campus buildings are open from 7:00 a.m. until 10:00 p.m., unless other specific building hours are established and posted.

The Building Coordinator in conjunction with the Bruin Card Office issues Bruin Card access to buildings within their area of responsibility, in accordance with this Policy and UCLA Procedure 825.1. The Building Coordinator is responsible for the overall administration of electronic building access via Bruin Card.

Specific responsibilities are assigned in order to implement and ensure compliance with this Policy.

A. Responsibilities

- 1. Facilities Management (FM) is responsible for:
 - a. Maintaining up-to-date records of: keying systems, issuance of all master keys, central key control files, and Building Entrance Key Control Coordinators as reported by departments. The central key control files identify key systems used, key-ways, master keys, change keys, types of lock on doors, and department contact information.
 - b. Fabricating and issuing all keys and installing Bruin Card readers:
 - For new buildings, the initial complement of keys for interior spaces and Bruin Card readers for at least two exterior entrances, will be furnished under the new building or alteration contracts by FM. The initial complement of keys and Bruin Card readers will be supplied as an expense against building project funds. Any subsequent issuance of keys or Bruin Card readers will be charged to the requesting department.
 - For additional or replacement of Bruin Card readers or keys or re-keying of existing departmental space, a <u>Facilities Service Request</u> (FSR) with the proper signature authorization is required from the Department Head or their designee. See <u>UCLA</u> <u>Procedure 825.1</u>, Building Entrance Keying, Electronic Access, and Control.
 - When a department receives a new allocation of space, FM should be consulted regarding keying of the newly assigned area.
 - c. Performing all lock work and Bruin Card reader installation, except work that is required using capital construction contractors.
 - d. Coordinating lost or stolen key records with the <u>UCLA Police Department (UCPD)</u>, if applicable. Determination as to whether re-keying of an area is required (e.g. because of lost or stolen keys) will be based on consultation between FM and the Department Head and/or their designee. If it is determined rekeying is necessary for departmental security purposes due to lost or stolen key(s), the cost will be the responsibility of the respective department.
 - e. Furnishing a list of master keys and rooms that a department controls, when requested by Department Head and/or their designee. Information will be provided in person only to the designated individual and will not be provided via telephone or email.

- f. Locking and unlocking campus buildings by Custodial Services according to posted building schedules, including requests to open buildings and classrooms during normal building hours. As buildings transition to Bruin Card access, any building schedule changes are the responsibility of the department(s) seeking the change and will be accomplished through direct coordination with the Bruin Card Office.
- g. Performing weekend openings and/or off-hour requirements by Custodial Services as requested by clients through a <u>Facilities Service Request</u>. This service is normally requested in support of a scheduled, off-hour or weekend event within the building and requires notification to Custodial Services at least two (2) business days before the off-hour or weekend event.
- h. Providing key access to buildings and/or offices to authorized individuals who have locked themselves out. This service is provided on a recharge basis and will be billed to the respective department's blanket account. In order to prevent unauthorized access, FM will verify in the official UCLA Space Inventory database that the individual is listed in the "occupant" field for the requested space. Individuals who are listed in the occupant field are also required to provide photo proof of identity prior to access being granted. In the interest of campus and department security, if the individual is either not listed as an authorized occupant of the space or does not possess a photo proof of identity, access cannot be provided. Approval must then be obtained by the respective Building Coordinator. See UCLA Procedure 825.1.
- i. Identifying the sequence of which facilities are to be placed on exclusive Bruin Card access, and notifying Building Coordinators at least sixty (60) days in advance of changing entrance door locks so that they may validate access for building occupants with the Bruin Card Office staff.
- 2. UCLA Police Department (UCPD) is responsible for:
 - a. Retaining reports of stolen keys and Bruin Cards.
 - b. Enforcing California Penal Code, <u>Section 469</u>, which applies to unauthorized use of keys to premises owned by the University of California.
 - c. Notifying the Bruin Card Office of any changes to the UCPD list of First Responders who require Bruin Card access to buildings.
- 3. UCLA Fire Department (UCFD) is responsible for:
 - a. Notifying the Bruin Card Office of any changes to the UCFD list of First Responders who require Bruin Card access to buildings.
 - b. Conducting periodic inspection and verification of key(s) or access control cards stored within building Knox Boxes. FM will supply UCFD with the current building key(s) and or key list upon request from authorized UCFD personnel.
- 4. Bruin Card Office is responsible for:

Receiving Bruin Card access requests from FM, UCPD, UCFD, and Department Building Coordinators and programming access for identified individuals into the respective building's Bruin Card system.

- 5. Department Head or their designee is responsible for:
 - a. Recovering all University keys from and as applicable, removing Bruin Card access for faculty, visiting scholars, staff, student employees and students under their jurisdiction who are terminating or transferring to another department or activity, and recording return of associated keys. See <u>UCLA Procedure 825.1</u>

- b. Issuing recovery of key letters to former faculty, visiting scholars, staff, student employees and students at the request of campus departments.
- c. Securely storing unassigned keys pending reassignment. Locked key boxes may be purchased from FM.
- d. Screening requests for opening campus buildings and rooms during off-hours or for nonclassroom space during normal building hours for authorized personnel holding valid identification.
- e. Maintaining departmental key records including take home keys, departmental keys, contact information, date of issuance, and date of retrieval.
- f. Ensuring that weekend openings and/or off-hour requests are scheduled through the use of a completed Facilities Service Request and submitted two (2) business days in advance of event to Custodial Services.
- g. Notifying the Building Entrance Key Control Coordinator regarding lost, stolen or refusal to return building entrance keys and notifying Building Coordinators of lost or stolen Bruin Card. See UCLA Procedure 825.1.
- 6. Faculty, visiting scholar, staff, student employee, or student to whom keys and/or Bruin Card access have been issued are responsible for:
 - a. Reporting lost, misplaced, or stolen Bruin Card and/or keys, as well as lockouts, to their supervisor.
 - b. Reporting loss or theft of University keys and/or Bruin Card to their department and reporting theft of University keys and/or Bruin Card to UCPD as soon as possible.
 - c. Reporting loss or theft of University master key rings to their department, FM, and to UCPD immediately.
 - d. Signing a key issuance record and maintaining security for any key issued.
 - e. Obtaining valid photo identification.
 - f. Returning keys to their respective department upon separation, transfer, or as requested by the department.
- 7. **Building Entrance/Departmental Key Control Coordinators** will be designated for each building or department. Department Head(s) may assign multiple Key Control Coordinators.
 - a. Coordinating with departments that are interested in installing the Bruin Card electronic building access system for buildings or facilities within their area of responsibility.
 - b. Coordinating lost or stolen Bruin Cards with the UCPD, if applicable.
 - c. Furnishing a list of rooms with Bruin Card access that a department controls, when requested by Department Head and/or their designee. Information will be provided in person only to the designated individual and will not be provided via telephone or email.
 - d. Maintaining departmental records of individuals with Bruin Card access, including contact information, date of access, and date of inaccessibility.
 - e. Reviewing/approving requests from departments for building entrance keys and Bruin Card access; performing periodic reviews of the departments' record keeping systems; distributing building entrance keys to departments and coordinating with departments on who can obtain Bruin Card access; providing FM with a list identifying individuals in each department who are authorized to request keys and who has Bruin Card access; and maintaining a list of individuals with building entrance keys and Bruin Card access.
 - f. Departmental Key Control Coordinators are responsible for establishing and maintaining control of the keys to interior spaces assigned to their departments; reviewing/approving

requests for keys; issuing a <u>Facilities Service Request</u> to FM with the proper signature authorization; distributing keys; and record keeping.

B. Special Security Keying, Keying Changes, or Off-Master Requests

Requests to key or Burin Card access any space as Off-Master requires a <u>Facilities Service</u> <u>Request</u> signed by the Department Head or their designee certifying that the space contains confidential personnel records, cash money, vivaria, or potentially harmful laboratory chemicals. If this is not the case, the Department Head or their designee must justify why the space must be Off-Master. All requests for any campus space as Off-Master requires approval from the Assistant Vice Chancellor, FM. All locks or Bruin Card reader installed will meet current building safety, fire and A.D.A. codes. The department is responsible for any damages that may result from forcible entry into an Off-Master space resulting from emergency response (i.e. flood, fire, earthquake, etc.).

For any Off-Master space, the department will pay for the cost of modifying the hardware. Additionally, the department will arrange for and fund all custodial work required in these room(s) through the use of a <u>Facilities Service Request</u>.

No department or individual may install locks, electronic access systems, or keys for space control nor may locks be changed without the prior evaluation and approval of the Department Head with the concurrence of FM, the appropriate governmental agencies, UCPD, and UCFD as appropriate. Suspected unauthorized locks and locking devices will be reported to FM, who will coordinate with the Department Head and UCPD, if necessary, prior to removal.

First Responders (i.e. UCPD, UCFD, etc.) will maintain access to all University buildings and spaces.

IV. REFERENCES

- 1. <u>UCLA Policy 360</u>, Internal Control Guidelines for Campus Departments (Section IV.D.3., regarding Custodial and Security Arrangements);
- 2. <u>UCLA Procedure 825.1</u>, Building Entrance Keying and Control;
- 3. UCLA Regulations on Activities, Registered Campus Organizations and Use of Properties;
- 4. UC Policies Applying to Campus Activities, Organizations and Students (PACAOS);
- 5. Online Facilities Service Request.

Issuing Officer

/s/ Kelly J. Schmader

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Questions concerning this policy or procedure should be referred to the Responsible Department listed at the top of this document.